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7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

* * *

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 vs.
13 CHAD HENRY LOFTIN,
14 Defendant.

2:13-cr-304-JCM-CWH

**STIPULATION FOR THE ADMISSION
OF ADDITIONAL EVIDENCE**

15
16 IT IS AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N.
17 Smith Jr., Assistant United States Attorney, counsel for the United States of America, and Rene L.
18 Valladares, Federal Public Defender, and Heidi A. Ojeda, Assistant Federal Public Defender, counsel
19 for defendant CHAD HENRY LOFTIN, hereby submit this Stipulation for the Admission of
20 Additional Evidence for the Court's consideration.

21 1. On November 20, 2014, the Court reopened the evidentiary hearing in this matter in
22 order to receive new evidence. (CR #99, Minutes of Proceedings). At the conclusion of that
23 hearing, undersigned counsel for the Defendant sought to introduce records from JP Morgan Chase
24 concerning the transaction activity of Mr. Loftin's EBT card. Undersigned counsel for the Defendant
25 had just received the records the morning of the hearing and provided the records to the Government
26 at the conclusion of the hearing. The Court requested that counsel meet and confer concerning the
27 records and if additional testimony needed to be received by the Court for their admission.

28 ///

1 2. The parties have met and conferred and now stipulate to the admission of the JP
2 Morgan Chase records as Defendant's Exhibit I, which are attached to this stipulation. The parties
3 further stipulate that the third column from the right titled "Log Time," lists the time the transaction
4 was processed. This time is reported in miliary time, and the times listed are recorded in Eastern
5 Standard Time.

6 3. The parties further stipulate that the Food 4 Less, located at 3864 W. Sahara, Las
7 Vegas, NV, is a distance of 0.9 miles from the Siegel Suites located at 2817 W. Sahara Ave., Las
8 Vegas, NV.

9 4. The parties request the Court accept this additional evidence and consider it in
10 drafting its Report and Recommendation.

11 DATED this 21st day of January, 2015.

12 RENE L. VALLADARES
13 Federal Public Defender
14 /s/ Heidi A. Ojeda
15 By: _____
16 HEIDI A. OJEDA
17 Assistant Federal Public Defender
18 Counsel for Chad Henry Loftin

12 DANIEL G. BOGDEN
13 United States of America
14 /s/ Phillip N. Smith, Jr.
15 By: _____
16 PHILLIP N. SMITH, JR.
17 Assistant United States Attorney
18 Counsel for the Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHAD HENRY LOFTIN,

Defendant.

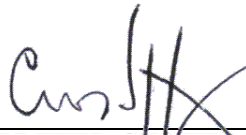
Case No.: 2:13-cr-304-JCM-CWH

ORDER

IT IS THEREFORE ORDERED that the attached JP Morgan Chase records are admitted as Defendant's Exhibit I.

IT IS FURTHER ORDERED that the Court will accept into evidence, without additional testimony, the fact that the Food 4 Less, located at 3864 W. Sahara, Las Vegas, NV, is a distance of 0.9 miles from the Siegel Suites located at 2817 W. Sahara Ave., Las Vegas, NV.

DATED 22 day of January, 2015.



C.W. Hoffman, Jr.
United States Magistrate Judge

EXHIBIT I

EXHIBIT I



Edith Frazier
Telephone: (817) 399-6801
Facsimile: (817) 399-5481

Texas Subpoena Processing
Mail Code TX1-0053
14800 Frye Road
Fort Worth, Texas 76155

11/20/2014

AFPD Heidi A Ojeda
Law Offices of the Federal Public Defender
411 E Bonneville, Suite 250
Las Vegas, Nevada 89101

RE: Subpoena Type: Prepaid Card / State or Federal Agency
Case Name: United States of America V. Chad Henry Loftin
Case No.: 2:13-cr-304-JCM-CWH
JPMorgan Chase File No.: SB603181-F1

Dear AFPD Heidi A Ojeda :

In response to your request, we have enclosed copies of account records regarding the above-referenced matter served upon JPMorgan Chase Bank, N.A. . See attached inventory listing for details.

If you have any questions, please call me at (817) 399-6801.

Sincerely,

A handwritten signature in black ink, appearing to read 'Edith Frazier', written over a horizontal line.

Edith Frazier
Document Review Specialist

Enclosure



INVENTORY LISTING

CHASE FILE NO.: SB603181-F1

Customer Name: Chad Loftin

Account No.: 5077159010756568

Request Type: PrePaid Debit Card -Transaction History/Card Information

Date Range: 7/5/2013 - 7/6/2013

Comment: 7/1/13 - 7/6/13

Unable to locate additional records responsive to the subpoena and/or request with the information provided.

Copies of items \$1.00 or less have not been provided

Name	Chad Loftin	EOA#	032002423411	Debit Account	Log Date	Log Time	Card Number	Merchant Name	MTI	ESI	Amount	Terminal ID	Location	City	State
				032002423411	20130701	11190726	5077159010756568	DOLLAR GEN	1	0	67.89	58369403	3700 E CHARLESTON BLV	LAS VEGAS	NV
				032002423411	20130701	08362819	5077159010756568	BENEFIT UPDATE	2	4	200.00				
				032002423411	20130702	20407809	5077159010756568	7-ELEVEN	1	0	9.56	00419120	2691 W SAHARA	LAS VEGAS	NV
				032002423411	20130702	20400450	5077159010756568	7-ELEVEN	1	0	0.00	00419120	2691 W SAHARA	LAS VEGAS	NV
				032002423411	20130702	14555764	5077159010756568	REBEL 2156	1	0	6.98	98137001	4220 E SAHARA AVENUE	LAS VEGAS	NV
				032002423411	20130702	04515048	5077159010756568	7-ELEVEN	1	0	0.99	00419120	15 N LAMB BLVD	LAS VEGAS	NV
				032002423411	20130702	01194265	5077159010756568	7-ELEVEN	1	0	11.31	00419120	15 N LAMB BLVD	LAS VEGAS	NV
				032002423411	20130703	03247560	5077159010756568	7-ELEVEN	1	0	9.36	00419120	15 N LAMB BLVD	LAS VEGAS	NV
				032002423411	20130705	21234922	5077159010756568	7-ELEVEN	1	0	9.28	00419120	2691 W SAHARA	LAS VEGAS	NV
				032002423411	20130705	12703444	5077159010756568	7-ELEVEN	1	0	9.14	00419120	2691 W SAHARA	LAS VEGAS	NV
				032002423411	20130706	00280796	5077159010756568	FOOD 4 LES	1	0	9.98	K7051505	3864 W SAHARA	LAS VEGAS	NV

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Wednesday, November 19, 2014

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